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JUMIO CORPORATION
15

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18

19 FACETEC INC., a Delaware corporation,

20 Plaintiff,

21 v.

22 JUMIO CORPORATION, a Delaware
corporation,

23 Defendant,
24

25 and

26 IPROOV LTD., a United Kingdom limited
company,

27 Defendant-Intervenor.
28

Case No. 3:24-cv-3623-RFL

**DECLARATION OF
ALEX S. YAP IN SUPPORT OF
JUMIO'S OPPOSITION TO
FACETEC'S MOTION TO
DISQUALIFY**

Date: July 1, 2025
Time: 10:00 AM
Courtroom: 15

Judge: Hon. Rita F. Lin
Action Filed: June 14, 2025

1 I, Alex S. Yap, declare:

2 1. I am a partner at the law firm of Morrison & Foerster LLP (“Morrison”). I make
3 this declaration based on my own personal knowledge. If called as a witness, I could and would
4 competently testify to the facts set forth herein.

5 2. Jumio Corporation (“Jumio”) retained Morrison to represent it in *inter partes*
6 review proceedings before the Patent Trial and Appeal Board challenging the FaceTec patents
7 asserted in this case (“IPR Proceedings”): IPR2025-00106 (U.S. Patent No. 10,776,471), IPR-
8 2025-00107 (U.S. Patent No. 11,157,606), IPR2025-00108 (U.S. Patent No. 11,693,938), and
9 IPR2025-00109 (U.S. Patent No. 11,874,910). The other Morrison attorneys who will be
10 working with me on the IPR Proceedings are Jean Nguyen and Mehran Arjomand. Mr. Arjomand
11 has not performed any work yet.

12 3. I have participated in two high-level calls with attorneys from Perkins Coie LLC
13 (“Perkins”) to discuss this case and the IPR proceedings.

14 4. On April 2, 2025, Ken Kuwayti and I had a high-level, introductory call about this
15 case with Gina Signorello, Jumio’s General Counsel, and Grant Kinsel of Perkins. On that call,
16 Mr. Kinsel described the ethical wall that had been put in place at the outset of the case and that
17 no members of his team had had communications about FaceTec with any Perkins attorneys who
18 had done prior work for FaceTec. Mr. Kinsel also identified categories of work product that
19 Perkins possessed without describing their content. We did not discuss any FaceTec products,
20 FaceTec patents, or the patentability, validity, or obviousness of any FaceTec patents. I do not
21 believe that any FaceTec confidential information was disclosed during this call.

22 5. On April 4, 2025, Ms. Nguyen and I had an introductory call regarding the IPR
23 Proceedings with Ms. Signorello, Mr. Kinsel, and Jessica Kaiser, the Perkins partner who had
24 been leading the IPR Proceedings. Prior to the call I wrote to make certain that no information
25 about Perkins’ prior representation of FaceTec would be shared. During the call, Ms. Kaiser
26 provided a high-level overview of the IPR Proceedings, including Jumio’s April 16 deadline to
27 file reply briefs concerning discretionary denial issues (“IPR Reply Briefs”). We did not discuss
28 any FaceTec products, FaceTec patents, or the patentability, validity, or obviousness of any

1 FaceTec patents—other than what is disclosed on the face of the publicly-filed IPR petitions. I do
2 believe that any FaceTec confidential information was disclosed during this call.

3 6. Other than the above-described calls, Jean, Mehran, and I have not had any oral
4 communications with any Perkins attorneys about this case, the IPR Proceedings, FaceTec, or any
5 FaceTec patents.

6 7. I have exchanged a handful of emails with Perkins attorneys to discuss this case
7 and the IPR proceedings. Those emails concerned logistics relating to an extension to file the IPR
8 Reply Briefs, as well as the filing of updated Powers of Attorney and mandatory notices for the
9 IPR Proceedings. Those emails do not include any information concerning FaceTec products,
10 FaceTec patents, or the patentability, validity, or obviousness of any FaceTec patents. I do not
11 believe that any FaceTec confidential information was disclosed in any of these emails.

12 8. Other than the above-described emails, Jean, Mehran, and I have not had any
13 written communications with any Perkins attorneys about this case, the IPR Proceedings,
14 FaceTec, or any FaceTec patents.

15 9. Other than the above-described communications, Jean, Mehran, and I have not had
16 any oral or written communications with Jumio about this case, the IPR Proceedings, FaceTec, or
17 any FaceTec patents.

18 10. I am aware of Perkins having provided to Morrison four declarations for the IPR
19 proceedings concerning the extent of any iProov involvement in the IPR Proceedings. I am not
20 aware of Perkins having provided any other work product to Morrison relating to this case, the
21 IPR Proceedings, FaceTec, or any FaceTec patents.

22 I declare under penalty of perjury that the foregoing is true and correct.

23 Executed this 27th day of May, 2025, in Los Angeles, California.

24
25 /s/ Alex S. Yap

Alex S. Yap
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ATTESTATION OF E-FILED SIGNATURE

I, Ragesh K. Tangri, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Alex S. Yap has concurred in this filing.

Dated: May 27, 2025

/s/ Ragesh K. Tangri
Ragesh K. Tangri